

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
BLUEFIELD

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:18-00243

KIMBERLY ADDAIR

SECOND SUPPLEMENTAL RESPONSE OF THE UNITED STATES  
OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a)(1)(E)]

Response:

1. See attached the relevant grand jury testimony taken on October 23, 2018.

Respectfully submitted,

MICHAEL B. STUART  
United States Attorney

By:

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "SECOND SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 11th day of December, 2018, to:

Lorena E. Litten, AFPD  
Federal Public Defender's Office  
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Room 3400  
Charleston, WV 25301

/s/ \_Timothy D. Boggess, AUSA\_  
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